

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEORGE TOWN ASSOCIATES S.A.,

Plaintiff,

v.

Case No. 15-CV-3435 (DLC) (JLC)

ABAKAN, INC. and MESOCOAT, INC.,

Defendants.

NOTICE OF MOTION FOR CONTEMPT AND APPOINTMENT OF RECEIVER

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Douglas Gross (and the exhibits attached thereto), and all prior pleadings, motions, declarations, and exhibits filed in this action, Plaintiff George Town Associates S.A. shall move this Court, before the Honorable Denise Cote at the Daniel Patrick Moynihan United States Courthouse, Courtroom 15B, 500 Pearl Street, New York, New York 10007, on August 18, 2015, for an order finding Defendants in contempt of the Court's Preliminary Injunction, appointing a receiver over MesoCoat, or in the alternative, ordering Defendants to place the sum of \$1,341,963.34 in the Court's Registry, awarding Plaintiff its attorneys' fees and costs in bringing this motion, and ordering such further relief as the Court deems just and proper.

Dated: New York, New York
July 28, 2015

GOETZ FITZPATRICK LLP
Attorneys for Plaintiff

By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, the Memorandum of Law, and the Declaration of Douglas Gross (and all exhibits thereto), were served via ECF on all counsel of record on this 28th day of July, 2015.

By: 
Douglas Gross